

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NEW FORTUNE, INC.,	:	
	:	
Plaintiff,	:	
	:	Case No.: 1:20-cv-04883 (DLC) (KNF)
- against -	:	
	:	
APEX LOGISTICS INTERNATIONAL (CN) LTD.,	:	
AND AEROFLOT AIRLINES	:	
	:	
Defendants.	:	
	:	
-----	X	

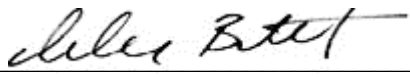
NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the Memorandum of Law and Declaration of Anthony U. Battista dated October 23, 2020, with accompanying exhibits, Defendants AEROFLOT RUSSIAN AIRLINES and APEX LOGISTICS INTERNATIONAL (CN) LTD. hereby jointly move this Court under Rule 12(b)(6) of the Federal Rules of Civil Procedure for an Order dismissing the Complaint on the ground that the Complaint fails to state a claim for which relief may be granted.

Dated: New York, New York
October 23, 2020

Respectfully submitted,

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Attorneys for Defendant
AEROFLOT RUSSIAN AIRLINES

- and -

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(CN) LTD.

CERTIFICATION OF SERVICE

I certify that a copy of this Notice of Motion to Dismiss as well as Defendants' Memorandum of Law in Support of their Motion to Dismiss and Affirmation of Anthony U. Battista in Support of Defendant's Motion to Dismiss and Exhibits thereto were served via the court's electronic filing system upon the following counsel of record on the 23rd day of October, 2020, upon:

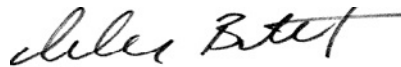
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through the court's e-filing system.



Anthony U. Battista, Esq.